

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

M CORP DBA 11:59,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:24-cv-1823
)	
INFINITIVE, INC., et al.)	
)	
<i>Defendants.</i>)	
_____)	

JOINT MOTION TO EXTEND TIME TO PRODUCE ESI DOCUMENTS

Plaintiff/Counterclaim Defendant M Corp DBA 11:59 (“11:59”), Counterclaim Defendant Alison Moye (“Moye”), Defendant/Counterclaim Plaintiff Infinitive, Inc. (“Infinitive”), Defendant Joseph Bradley Sheridan (“Sheridan”) and Defendant Databricks, Inc. (“Databricks”) by their undersigned joint counsel jointly move for an extension of time to respond to certain outstanding document requests.

1. The above matter involves five parties represented by four groups of Counsel.
2. Each of the parties in this action have been served with requests for documents under Rule 34, which require, among other things, the searching and production of electronically stored information of email and text message records (“ESI Documents”).
3. In order to reduce the burden of the review and production of the ESI Documents, as well as promote efficiency, the parties have been negotiating limited custodian lists and keyword search terms from which the producing parties can review documents for responsiveness.

4. Due to on-going negotiations over the scope of search terms, each of the parties has, respectively, failed to produce their responsive ESI Documents in the time limits established under Rule 34.

5. Counsel for all parties met and conferred on Monday, June 23, 2025, to discuss the outstanding ESI Documents, and continued to negotiate ESI search terms and protocols throughout the week.

6. The parties have agreed to the scope and terms of the ESI searches, but may subsequently adjust search terms to reduce the burden on the producing party and/or account for mis-hits.

7. The parties discussed the volume of documents that still need to be reviewed prior to production, as well as the likely deposition schedule. The parties believe that an extension of the deadline to produce ESI Documents to July 14, 2025 will allow the parties sufficient time to ensure full production, while also preserving sufficient time for depositions.

8. The parties, therefore, respectfully request that the Court enter the attached order extending the deadline for production of currently outstanding ESI Documents to July 14, 2025.

9. The grant of this motion will not otherwise delay discovery, require the extension of other deadlines, or cause prejudice to any party.

10. The parties waive hearing on this Motion.

For the foregoing reasons all parties request that this Motion be granted.

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